

Summary of Public Comments Received October 1, 2021 – October 15, 2021 and CDFA Response
Water Efficiency Technical Assistance Program

Name	Organization	Date Comment Received	Summarized Comment	Response
Anna Larson	CalCAN	10/15/2021	<p>The newly proposed WETA program aligns well with recommendations to increase funding for this type of training, a need identified in 2017 Fresno State Irrigation Center report. CalCAN understands the need to support coordination and provision of pump efficiency testing for farmers. Additionally, they support the requirement that grant recipients must prioritize assistance to SDFR and farms that are 500 acres or less and is happy to see that WETA identifies the development of training materials for non-English speakers as a crucial need.</p> <p>CDFA should clarify that paying for pump tests through WETA does not constitute assisting farmers who apply to SWEEP.</p>	<p>CDFA has added language to make it clear that WETA can help farmers and ranchers obtain pump tests and is not considered application assistance for potential future SWEEP applicants. Additional language was added to the RGA.</p>
Valerie Quinto	Sonoma RCD	10/14/2021	<p>Indirect cost rates that have been vetted and approved by cognizant agencies (i.e., Negotiated Indirect Cost Rate Agreements, or NICRAs) should be accepted for all grant recipients. The current program has an indirect cost reimbursement rate of 20% for non-UC and CSU applicants.</p> <p>Grant recipients should be allowed to be charged a small fee to farmers to cover a portion of the cost of technical assistance. This will allow for the grant funds to be stretched further and more importantly it assures that</p>	<p>The WETA programs indirect rates will align with the indirect rates that was established through CDFA's Climate Smart Agricultural Technical Assistance Program and will remain at the 20% rate for Non-Profits, Resource Conservation Districts and Tribes.</p> <p>The cost of the technical assistance will be covered by the WETA grant. WETA providers should not charge a fee for the service to growers. It is possible that some growers will be less invested than others, but the interaction</p>

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			<p>participating landowners are invested in the services provided. Allow for cost share reductions or waivers for those who demonstrate need. These fees can be used to recover indirect costs that are lacking.</p> <p>Grant recipients should not be required to produce certificates of completion for on demand trainings. Some do not have the technological capacity to verify who viewed the trainings on demand. If certificates are required, CDFA should provide the platform where the grant recipients can upload content and rely on the platform to produce certificates.</p> <p>Provide further clarification on assistance related to irrigation water management (IWM) systems that is allowable under this grant program. The criteria are unclear and the commentor is unsure if this apply for current IWM systems or if they could assist in assessing if IWM should be recommended for this ag operation. Additionally, they would like clarity what IWM recommendations can be recommend and the grant makes clear that specific brands should not be advocated for.</p>	<p>with WETA providers may still be beneficial even if continuous active engagement is not the outcome.</p> <p>The RGA will be updated to indicate that a training certificate is strongly encouraged but not required for all irrigation training programs (in-person, live online, and on-demand webinars). CDFA encourages organizations to partner with others that have the capacity to produce certificates for on-demand webinar trainings. The development of non-English on-demand training materials is a critical need.</p> <p>WETA providers may assist growers with their existing Irrigation Water Management (IWM) and provide training on how to properly use the tools. Additionally, WETA providers may work with growers to identify IWM tools and practices that will help with water use efficiency and nutrient management.</p>